

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Newport News Division

LIBERTY COUNSEL, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 4:17-CV-71
	)	
GUIDESTAR USA, INC.,	)	
	)	
Defendant.	)	
	)	

**GUIDESTAR USA, INC.’S UNOPPOSED MOTION FOR LEAVE TO FILE  
NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF  
MOTION TO DISMISS THE COMPLAINT**

Defendant GuideStar USA, Inc. (“GuideStar”), by counsel and pursuant to Rule 7(F)(1) of the Local Civil Rules, respectfully moves this Court for leave to file a Notice of Supplemental Authority in Support of its Motion to Dismiss the Complaint.

The proposed Notice, which is attached as Exhibit 1, concerns the Fourth Circuit Court of Appeals’ decision last week in *Handsome Brook Farm, LLC v. Humane Farm Animal Care, Inc.*, No. 16-1813, 2017 WL 3601506 (4th Cir. Aug. 22, 2017) (unpublished). The grounds for this motion are more fully set forth in GuideStar’s Memorandum in Support of Unopposed Motion for Leave to file Notice of Supplemental Authority in Support of Motion to Dismiss the Complaint.

Liberty Counsel has advised undersigned counsel that Liberty Counsel consents to GuideStar’s motion for leave to file a notice of this supplemental authority.

A proposed order granting this Motion is attached as Exhibit 2.

Respectfully submitted,

GUIDESTAR USA, INC.

By: \_\_\_\_\_/s/  
Sona Rewari (VSB No. 47327)  
HUNTON & WILLIAMS LLP  
2200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037  
(703) 714-7512  
(703) 918-4018 (facsimile)  
[srewari@hunton.com](mailto:srewari@hunton.com)

Gregory N. Stillman (VSB No. 14308)  
Wendy C. McGraw (VSB No. 37880)  
HUNTON & WILLIAMS LLP  
500 East Main, Suite 1000  
Norfolk, Virginia 23510  
(757) 640-5300  
(757) 625-7720 (facsimile)  
[gstillman@hunton.com](mailto:gstillman@hunton.com)  
[wmcgraw@hunton.com](mailto:wmcgraw@hunton.com)

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of August, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

\_\_\_\_\_/s/  
Sona Rewari (VSB No. 47327)  
HUNTON & WILLIAMS LLP  
2200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037  
(703) 714-7512  
(703) 918-4018 (facsimile)  
[srewari@hunton.com](mailto:srewari@hunton.com)